

## **REMARKS**

In the Office Action, claims 14-20 were withdrawn and claims 1-13 and 21 were rejected. By this Reply and Amendment, claim 1 has been amended to clarify aspects of the claim language, and claims 1-13 and 21 remain pending in the present application. All claim amendments are fully supported throughout the written description and figures of the specification. For example, the amendments to claim 1 are fully supported in paragraphs 0012 and 0013 which describe intermeshed fibers 16 and the use of needles that are pushed through layers of the mesh medium to obtain "interlocking fibers 16 from different layers." Further support is provided throughout the written specification and figures of the application.

Claims 1-13 were rejected under 35 USC 112, first paragraph, as failing to comply with the written description requirement. Although Applicants strongly traverse this rejection, it is respectfully submitted the rejection is moot in light of the amendments to independent claim 1 and the supporting specification language, as discussed in the previous paragraph.

Claims 1-7 and 12-13 were rejected under 35 USC 102(b) as anticipated by the Whitlock et al. reference, US Patent No.: 6,006,829. Independent claim 1 has been amended to clarify certain aspects of the claim language, and claim 1 as well as its dependent claims are believed patentably distinct over the cited reference.

The Whitlock et al. reference discloses a filter for use in subterranean environments. The filter includes an inner support member 10 and a filter body 20. Inner support member 10 is a hollow tubular member that permits fluid flow into its hollow center. (See column 3, lines 38-67). Filter body 20 includes at least one filtering layer 23. The at least one filtering layer 23 is illustrated as three adjacent filtering layers 23. (See column 5, lines 38-67). However, the reference does not disclose or suggest interlocking the layers, and certainly does not suggest interlocking the layers with fibers extending from one layer to another. In the Office Action, assertions are made that the reference discloses a mesh medium having interlocking layers of mesh material, but this broad assertion is believed to be incorrect.

With specific reference to amended, independent claim 1, the Whitlock et al. reference fails to disclose or suggest, for example, a mesh screen apparatus for use in wells in which a mesh medium has "interlocking layers of mesh material, the interlocking layers being connected by fibers extending from an individual interlocking layer into the next adjacent interlocking layer...." Claims 2-7 and 12-13 ultimately depend from amended, independent claim 1 and are patentable for the reasons provided above with respect to claim 1 as well as for the unique subject matter recited in those dependent claims. Accordingly, claims 1-7 and 12-13 are believed patentable over the cited reference.

Claims 8-11 were rejected under 35 USC 103(a) as unpatentable over the Whitlock et al. reference in view of the Schulte reference, US Patent No.: 6,237,780. Claims 8-11 ultimately depend from amended, independent claim 1 and are patentable for the reasons provided above with respect to independent claim 1, as well as for the unique subject matter recited in each of the dependent claims. The Schulte reference discloses screen configurations for a vibratory separator, but the reference does not obviate the deficiencies of disclosure in the Whitlock et al. reference. Accordingly, claims 8-11 are patentably distinguishable over the cited references.

Claim 21 was rejected under 35 USC 103(a) as unpatentable over the Whitlock et al. reference in view of the Bayne et al. reference, US 2002/0007948. This rejection is respectfully traversed. The cited references, taken alone or in combination, simply do not disclose elements of independent claim 21.

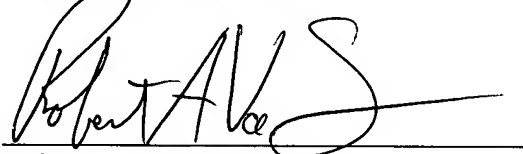
The Bayne et al. reference describes a well system having auxiliary conduits that can be used in gravel packing applications. The conduits 212 can be disposed between a shroud assembly 200 and gravel pack screens 214. (See paragraph 0031). Additionally, the conduits 212 can include a fiber optic cable within or outside of the conduit. (See paragraph 0032). However, the reference does not disclose a mesh medium.

In fact, neither reference discloses or suggests a mesh medium having "interlocking layers of mesh material" as recited in independent claim 21. Furthermore, neither reference discloses or suggests "at least one intelligent completion device which the mesh medium at least

partially encloses" to prevent infiltration of particulates into equipment, as also recited in independent claim 21. Because the cited references, taken alone or in combination, do not disclose or suggest these specific elements set forth in independent claim 21, no prima facie case of obviousness has been established. Accordingly, the rejection of independent claim 21 must be withdrawn.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert A. Van Someren", written over a horizontal line.

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Date: October 20, 2005

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